

EXHIBIT B



ATTORNEYS AT LAW

James Spielberger ‡†
 Gabrielle Klepper *† ◊ ★ ◊ ‡
 Lisa Scheibly *
 Zane Herman *
 Jeffrey Del Rio *◊ ‡
 Christopher A. Fennell *
 Abby Salzer * ▲
 Gary Martoccio **★◊ ‡
 Joshua Robert Rich *∇
 Eric D. Rogers * ◊
 Eric Bossardt *
 Samuel Doxsee *

November 13, 2019

Hiossen
 ATTN: Human Resources Director/General Counsel
 270 Sylvan Ave. Ste 1130
 Englewood Cliffs, NJ 07632

RE: Your employee Alana Bailey

Dear Sir or Madam:

Alana Bailey has retained this law firm to represent her regarding her employment claims against Hiossen. Please direct all future correspondence, communications, and documents regarding this matter to our firm.

Hiossen is discriminating against Ms. Bailey on the basis of her race (Caucasian) and her age in violation of Title VII of the Civil Rights Act of 1964 and the Age Discrimination in employment Act of 1967. Ms. Bailey is one of the oldest employees in her region. Most of the employees Hiossen hires are under 35 and Korean. Recently, Hiossen implemented a business model from Korea. Before the transition, Ms. Bailey was consistently meeting or exceeding sales goals. After this transition, Hiossen changed Ms. Bailey's zip codes, severely hindering Ms. Bailey's sales numbers, and gave new, younger, Korean employees large accounts that disproportionately advantaged the Korean employees. Hiossen then subjected Ms. Bailey to heightened scrutiny, criticizing her sales numbers which Hiossen had hindered. Hiossen did not subject Korean employees to the same level of scrutiny. Further, the Branch Manager calls Ms. Bailey on weekends and after work hours to berate her about her sales and threaten to terminate her. Younger, Korean employees are not subjected to such blatant hostility.

We are sending this correspondence in hopes that this matter will be fully reviewed by Hiossen and can be amicably resolved by the parties prior to our firm taking further action. Please call my office at your earliest convenience to discuss your interest in resolving these issues: (800) 965-1570 ext. 106.

Regards,

A handwritten signature in black ink, appearing to read "Gary Martoccio".

Gary Martoccio
 gary.martoccio@spielbergerlawgroup.com

OF COUNSEL:



ONLY LICENSED IN:

† SC
 ‡ GA
 ◊ VA
 ‡ NC
 * IL
 ◊ TX
 * FL
 ★ AZ
 ◊ PA
 ◊ CO
 ▲ OH
 ∇ TN

cc: Alana Bailey
 Samuel Doxsee

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PRESERVATION NOTICE & LITIGATION HOLD

This letter serves as formal notice of your ongoing legal duty to preserve any and all information relevant to the facts surrounding this claim. Your duty to preserve evidence extends to the following: 1) business records, 2) paper, digital, or electronic files, 3) data generated by and/or stored on you or your client's computers and storage media (e.g., hard disks, floppy disks, backup tapes), 4) any other electronic data, such as: voice mails, text messages, emails, digital/analog audio recordings, 5) any related physical evidence, and 6) any form of video recordings (please prevent the automatic deletion of video footage by preprogrammed deletion cycles). Violations of the legal duty described in this notice can result in severe sanctions being imposed by the Court for spoliation of actual evidence or potential evidence.